

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 25-30002
	)	(Chapter 11)
GENERATIONS ON 1ST, LLC	)	
	)	
Debtor	)	
_____	)	
In re:	)	Case No. 25-30003
	)	(Chapter 11)
PARKSIDE PLACE, LLC	)	
	)	Jointly Administered
Debtor	)	
_____	)	
GENERATIONS ON 1ST, LLC, <i>et al.</i>	)	Adv. Case No. 25-07009
	)	
Plaintiffs	)	
	)	
v.	)	
	)	
RED RIVER STATE BANK	)	
	)	
Defendant	)	
_____	)	

**JOINDER IN MOTION TO DISMISS  
COUNTERCLAIM AND STRIKE THIRD-PARTY CLAIM**

Come now Jordan Horner, Jesse Craig, Craig Properties, LLC, and Craig Development, LLC (collectively, the "Third-Party Defendants"), by and through undersigned counsel, and hereby join in the Motion to Dismiss Counterclaim and Strike Third-Party Claim (the "Motion"), filed by Generations on 1st, LLC and Parkside Place, LLC (collectively, the "Debtors" or "Plaintiffs") at Docket Entry #36 on January 6, 2026, and in support thereof state as follows:

1. The Third-Party Defendants were impleaded by Red River State Bank ("RRSB") in its Counterclaim and Third-Party Complaint, filed at Docket Entry #31, asserting claims against

them in counts seven through fourteen, including claims for fraudulent transfers under state law (counts seven through twelve) and veil-piercing (counts thirteen and fourteen).

2. The Third-Party Defendants adopt and incorporate by reference the arguments, authorities, and requests for relief set forth in the Motion.

3. The Third-Party Defendants agree that none of the claims asserted against them by RRSB fall within the narrow scope of Rule 14(a), as they are not derivative of or dependent upon the Plaintiffs' claims against RRSB. Instead, they represent independent grievances that RRSB may not pursue via third-party practice.

4. Granting the Motion would promote judicial efficiency, avoid unnecessary litigation, and align with controlling Eighth Circuit precedent and the Federal Rules of Civil Procedure, as applied in adversary proceedings under Federal Rule of Bankruptcy Procedure 7014.

WHEREFORE, the Third-Party Defendants respectfully join in the Motion and pray this Honorable Court (i) dismiss counts one through twelve of the Counterclaim and Third-Party Complaint; (ii) strike counts seven through fourteen of the Counterclaim and Third-Party Complaint; and (iii) afford such other and further relief as may be just and proper.

Respectfully Submitted,

Dated: January 16, 2026

By: /s/ Daniel J. Frisk  
Daniel J. Frisk  
Schwab Thompson & Frisk  
820 34<sup>th</sup> Ave. E. Suite 200  
West Fargo, ND 58078  
(701) 365-8088

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16th day of January, 2026, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Daniel J. Frisk  
Daniel J. Frisk